

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MARIE LAURETTE DUSSAULT,

Plaintiff,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.
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06 Civ. 13085 (TPG)

**DECLARATION OF ELIZABETH M. HANLY IN OPPOSITION TO PLAINTIFF'S
MOTION FOR EQUITABLE RELIEF**

Pursuant to 28 U.S.C. § 1746, Elizabeth M. Hanly declares as follows:

1. I am an attorney admitted to practice before this Court and an associate at Cleary Gottlieb Steen & Hamilton LLP, counsel for defendant the Republic of Argentina (the "Republic") in this matter. I submit this declaration on behalf of the Republic in opposition to plaintiff's motion for equitable relief.

2. Attached to this declaration as Exhibits A-L are true and correct copies of the following documents:

Documents Concerning English Law


Ex.	Document
A	Declaration of Lord Peter Millett, <i>Red Pines LLC et al. v. Republic of Argentina</i> , No. 14 Civ. 9427 (TPG) (S.D.N.Y. July 23, 2015);
B	Reply Declaration of Lord Peter Millett, <i>Red Pines LLC et al. v. Republic of Argentina</i> , No. 14 Civ. 9427 (TPG) (S.D.N.Y. Feb. 11, 2016);
C	Declaration of Matthew Hardwick QC, <i>Red Pines LLC et al. v. Republic of Argentina</i> , No. 14 Civ. 9427 (TPG) (S.D.N.Y. Feb. 12, 2016);

Other Documents

Ex.	Document
D	Declaration of Undersecretary of Finance Santiago Bausili in Support of the Republic of Argentina's Motion, By Order to Show Cause, to Vacate Injunctions Issued on November 21, 2012, and October 30, 2015, <i>NML Capital, Ltd. et al. v. Republic of Argentina</i> , No. 08 Civ. 6978 (TPG) (S.D.N.Y. Feb. 11, 2016);
E	Press Release, <i>Readout from a Treasury Spokesperson of Secretary Lew's Call with Argentine Finance Minister Alfonso Prat-Gay</i> (Feb. 7, 2016);
F	Statement of Daniel A. Pollack, Special Master in Argentina Debt Litigation, dated Feb. 5, 2016;
G	<i>Swiss Life AG v. Moses Kraus</i> [2015] EWHC 2133 (QB);
H	<i>Knighthead Master Fund LP v. Bank of New York Mellon</i> [2015] EWHC 270 (Ch), Case No. HC-2014-000704;
I	<i>Kensington Int'l Ltd. v. Republic of Congo</i> [2003] EWHC 2331 (Comm);
J	Trust Deed, dated July 27, 1993;
K	Memorandum of Law of the Republic of Argentina in Opposition to Motions by 526 Plaintiffs in 37 Actions Seeking Partial Summary Judgment, <i>NML Capital, Ltd. v. Republic of Argentina</i> , No. 14 Civ. 8601 (TPG) (S.D.N.Y. Mar. 17, 2015);
L	Memorandum of Law of the Republic of Argentina in Opposition to Motions in 45 Actions Seeking Specific Performance, <i>NML Capital, Ltd. v. Republic of Argentina</i> , No. 14 Civ. 8601 (TPG) (S.D.N.Y. Sept. 25, 2015).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 12, 2016 in New York, New York.



ELIZABETH M. HANLY